

**APPROPRIATENESS OF COMPELLING TESTIMONY OF JAMES
TROUPIS REGARDING SPECIAL DOCUMENTS**

Exhibit A

<u>Bates No./E-mail No.:</u>	<u>Troupis suggestion regarding testimony following a Court Order</u>	<u>Reason(s):</u>
JRT001-008 (docs 1-14)	Yes	Innocuous documents; third-party conversation; reflects predominantly political, strategic, or policy items, not legal
JRT009-010 (docs 15-16)	No	Did not author; has nothing to add
JRT011 (doc 17)	Yes	Reflects contents of third-party conversation
JRT011-012 (doc 18)	No	Client communication concerning core legal principle
JRT013 (docs 19-20)	Yes	Reflects contents of third-party conversation
JRT014-018 (docs 21-29)	No	Troupis has nothing to add
JRT019-022 (docs 30-32)	No	Contains core legal advice and attorney mental impressions; contains attorney work product and is primarily legal advice rather than political or policy advice
JRT023 (doc 33)	No	Has nothing to add
JRT024 (doc 34)	Yes	Contains primarily political and policy issues
JRT024 (doc 35)	No	Has nothing to add
JRT025-032 (docs 36-38)	Yes	Contains primarily political and policy issues
JRT033-034 (docs 39-40)	No	Contains core legal advice and Troupis' mental impressions; attorney work product; primarily legal rather than political or policy advice

<u>Bates No./E-mail No.:</u>	<u>Troupis suggestion regarding testimony following a Court Order</u>	<u>Reason(s):</u>
JRT035-047 (docs 41-64)	No	Has nothing to add
JRT047 (doc 65)	Yes	Primarily involves policy or strategy issues
JRT048 (doc 66)	No	Has nothing to add
JRT049-050 (doc 67)	Yes	Contains summary of third-party conversation of primarily political nature
JRT050-051 (docs 68-69)	No	Has nothing to add
JRT052-055 (docs 70-73)	No	Contains core legal advice and mental impressions; attorney work product; legal issues predominate any political or policy issues
JRT056-057 (docs 74-75)	No	Has nothing to add
JRT058-061 (docs 76-82)	No	Contains core legal advice and mental impressions; attorney work product; legal issues predominate any political or policy issues
JRT062-063 (docs 83-84)	No	Has nothing to add
JRT065-067	No	Attorney mental impressions and work product; primarily legal rather than political or policy-related
JRT068-072	No	Has nothing to add
JRT073-074	No	Client seeking legal advice; primarily legal rather than political or policy-related
JRT075-079	No	Has nothing to add
JRT080	Yes	Primarily political and policy-related as opposed to legal
JRT081-082	No	Contains attorney mental impressions and work product; legal advice predominates over political or policy-related issues

<u>Bates No./E-mail No.:</u>	<u>Troupis suggestion regarding testimony following a Court Order</u>	<u>Reason(s):</u>
JRT083-085	No	Has nothing to add
JRT086-090	Yes	Primarily political and policy rather than legal advice
JRT091-095	No	Has nothing to add
JRT096	Yes	Primarily political and policy rather than legal advice
JRT097-099	No	Has nothing to add
JRT100-110	Yes	Third-party communications; primarily policy-related rather than legal
JRT111-114	No	Primarily involves legal advice and attorney mental impressions
JRT115-119	No	Has nothing to add
JRT120-121	Yes	Primarily involves political and policy issues rather than legal advice
JRT122-127	No	Primarily involves legal advice and attorney mental impressions